

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

UNITED STATES OF AMERICA,	:	
	:	
Plaintiff,	:	
	:	
v.	:	Criminal Action No. 06-69-GMS
	:	
LIONEL BELL	:	
	:	
Defendant.	:	

**DEFENDANT'S JOINT UNOPPOSED MOTION TO PERMIT CURRENT DEFENSE
COUNSEL'S WITHDRAWAL AND TO APPOINT THE FEDERAL PUBLIC
DEFENDER'S OFFICE FOR THE DISTRICT OF DELAWARE AS COUNSEL**

Defendant, Lionel Bell, by and through his undersigned counsel, James A. Natalie, Jr., and Edson A. Bostic, Federal Public Defender for the District of Delaware, hereby move this court for an Order permitting Mr. Natalie's withdrawal as current defense counsel, and appointing the Federal Public Defender's Office for the District of Delaware as Mr. Bell's defense counsel.

The grounds for this Motion are as follows:

1. On August 3, 2006, United States Magistrate Judge Mary Pat Thyng appointed Mr. Natalie to represent Mr. Bell.
2. On December 8, 2006, Mr. Bell entered a guilty plea to Count I of the Indictment filed against him.
3. On June 26, 2007, the Court sentenced Mr. Bell to a minimum mandatory fifteen years of incarceration as an armed career criminal. Upon information and belief, Mr. Bell informed Mr. Natalie of his desire to appeal his sentence.
4. At the time of Mr. Bell's sentencing, Mr. Natalie informed the Court of his intent to withdraw as Mr. Bell's counsel.

5. On June 26, 2007, Mr. Natalie informed Mr. Bostic that he could no longer represent Mr. Bell because of his current trial schedule. Both parties agreed that, upon the Court's permission, the Federal Public Defender's Office would assume Mr. Bell's representation. The parties also agreed that the Federal Public Defender's Office would file the instant motion.

6. On June 27, 2007, Mr. Bostic conferred with Illana H. Eisenstein, Assistant United States Attorney, regarding this motion. Ms. Eisenstein informed Mr. Bostic that the government does not oppose this motion.

WHEREFORE, it is respectfully requested that James A. Natalie, Jr., be allowed to withdraw as counsel, and that the Federal Public Defender's Office for the District of Delaware be appointed to represent Mr. Bell.

Respectfully submitted,

/s/ Edson A. Bostic
EDSON A. BOSTIC
Federal Public Defender
704 King Street, Suite 110
Wilmington, DE 19801

/s/ James A. Natalie, Jr.
JAMES A. NATALIE, JR.
Woloshin, Lynch, Natalie & Gagne, P.A.
3200 Concord Pike, P.O. Box 7329
Wilmington, DE 19803-7329

Dated: June 28, 2007

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FOR THE DISTRICT OF DELAWARE

UNITED STATES OF AMERICA,	:	
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Plaintiff,	:	
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	:	
Defendant.	:	

ORDER

AND NOW, this _____ day of _____, 2007, upon consideration of Defendant's Joint Unopposed Motion to Permit Current Defense Counsel to Withdraw As Counsel and to Reappoint The Federal Public Defender's Office for the District of Delaware as Counsel, it is hereby **ORDERED** that James A, Natalie, Jr., will be allowed to withdraw as counsel, and that the Federal Public Defender's Office for the District of Delaware will be reappointed to represent Defendant, Lionel Bell.

BY THE COURT:

The Honorable Gregory M. Sleet
United States District Court